

Legislative Audit Division

State of Montana



Report to the Legislature

January 1998

Performance Audit

STATE DOCUMENTS COLLECTION

FEB 23 1998

MONTANA STATE LIBRARY
1515 E. 6th AVE.
HELENA, MONTANA 59620

Disaster and Emergency Services

**Department of Military Affairs, Division of Disaster and
Emergency Services**

County Disaster and Emergency Services Agencies

This report contains assessments of the four phases of emergency management in Montana:

- ▶ Mitigation -- Activities limited; recommendations for risk analysis, funding, and use of staff.
- ▶ Preparedness -- Most activities effective; continued emphasis needed.
- ▶ Response -- Activities effective; coordination continues to improve.
- ▶ Recovery -- Activities effective; improvements reflected.

Direct comments/inquiries to:
**Legislative Audit Division
Room 135, State Capitol
PO Box 201705
Helena MT 59620-1705**



PERFORMANCE AUDITS

Performance audits conducted by the Legislative Audit Division are designed to assess state government operations. From the audit work, a determination is made as to whether agencies and programs are accomplishing their purposes, and whether they can do so with greater efficiency and economy. In performing the audit work, the audit staff uses audit standards set forth by the United States General Accounting Office.

Members of the performance audit staff hold degrees in disciplines appropriate to the audit process. Areas of expertise include business and public administration, statistics, economics, computer science, communications, and engineering.

Performance audits are performed at the request of the Legislative Audit Committee which is a bicameral and bipartisan standing committee of the Montana Legislature. The committee consists of six members of the Senate and six members of the House of Representatives.

MEMBERS OF THE LEGISLATIVE AUDIT COMMITTEE

Senator Linda Nelson, Chairman	Representative Bruce Simon, Vice Chairman
Senator Sue Bartlett	Representative Beverly Barnhart
Senator Reiny Jabs	Representative Ernest Bergsagel
Senator Tom Keating	Representative A. R. "Toni" Hagener
Senator Ken Miller	Representative Bob Keenan
Senator Fred VanValkenburg	Representative Robert Pavlovich

LEGISLATIVE AUDIT DIVISION

Scott A. Seacat, Legislative Auditor
John W. Northey, Legal Counsel
Tori Hunthausen, IT & Operations Manager



Deputy Legislative Auditors:
Jim Pellegrini, Performance Audit
James Gillett, Financial-Compliance Audit

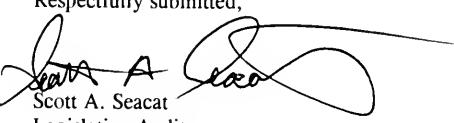
January 1998

The Legislative Audit Committee
of the Montana State Legislature:

We conducted a performance audit of the disaster and emergency services program in Montana. The Disaster and Emergency Services Division, Department of Military Affairs, is responsible for state planning and overall program development. County and municipal government officials are responsible for local program implementation and response. This report contains recommendations for improving program operations at the state and local level. Written response from the Department of Military Affairs is included at the end of the report. Copies of the report were mailed to chief-elected officials in all 56 counties.

We appreciate the cooperation and assistance of department staff and county officials during the audit.

Respectfully submitted,


Scott A. Seacat
Legislative Auditor

Digitized by the Internet Archive
in 2010 with funding from
Montana State Library

<http://www.archive.org/details/disasteremergenc1998mont>

Legislative Audit Division

Performance Audit

Disaster and Emergency Services

**Department of Military Affairs, Division of Disaster and
Emergency Services**

County Disaster and Emergency Services Agencies

Members of the audit staff involved in this audit were Tom Cooper and Mary Zednick.

Table of Contents

	List of Figures and Tables	v
	Administrative Officials	vi
	Report Summary	S-1
Chapter I - Introduction	Introduction	1
	Audit Objectives	1
	Audit Scope and Methodologies	1
	Methodologies	2
	DES Responsibilities	2
	County Activities	3
	Program Funding	3
	State Emergency Response Commission	4
	Report Organization	4
	DES in Compliance	4
	Management Memorandum	5
Chapter II - Background	Introduction	7
	Statute Provides for Four Phases of Emergency Management	7
	Local Jurisdiction Responsible	8
	Mutual Aid Agreements	8
	Local Emergency or Disaster Declaration	8
	Emergency Mill Levy	9
	Governor's State Declarations	9
	Federal Assistance Requires Presidential Declaration	10
	Federal Assistance does not Require Emergency Levy	10
	Other Entities Qualify	11
	Presidential Declaration Funding	11
	Federal Assistance Process	12
	Public Assistance Officer Designated	12
	Federal Individual and Family Assistance	12
	Individual Assistance Officer Designated	13
	Disaster and Emergency Services Division	13
	Disaster and Emergency Services Mission	14
	DES Staff and Programs	14
	District Representatives Advise Local Jurisdictions	14
	Disaster and Emergency Services Funding	16

Table of Contents

Chapter III - County Disaster and Emergency Services	Cooperative Agreement between DES and FEMA	16
	Grant Funding in Disaster Coordination Response Fund	16
	Emergency and Disaster Fund	17
	State Emergency Response Commission	18
	Hazardous Material Response	19
	Oversight of Local Emergency Planning Committee	19
	Annual Plan Review by District Representatives	19
Chapter III - County Disaster and Emergency Services	Introduction	21
	Local Coordinators	21
	County Consolidations	23
	Alternative Available to Local Officials	23
	<i>Conclusion: Consolidation an Effective Alternative</i>	24
	Counties Eligible for Federal Funding	24
	Annual Statement of Work	24
	Local Preparedness	25
	Local Emergency Operations Plans	25
	Planning Committees Participate in the Process	26
	<i>Conclusion: Combined Committees Effective Alternative</i>	26
	Plans Require Update	26
	<i>Conclusion: Review Process could be Strengthened</i>	27
	Emergency Operations Centers	27
	Local EOC Capabilities Vary	28
	<i>Conclusion: Emphasize Local EOC Needs</i>	28
	Conduct Emergency Plan Exercises	28
	Exercise Planning and Design Focuses on Teamwork	29
	Emphasis on Number of Exercises	29
	Revise Exercise Scheduling Criteria	30
Chapter IV - Assessments of Emergency Management	Introduction	31
	Mitigation Phase	31
	What is Mitigation?	31
	Mitigation Starts with Hazard Identification	32
	Hazards and Risks Vary Between Counties	33
	<i>Conclusion: Tailor Local Risk Analysis Assistance</i>	33
	Hazard Mitigation Grant Program	33
	Mitigation Position Responsibilities Evolving	34
	Costs-Benefit is Complex	34
	Local Projects Identified	35

Table of Contents

Funding Alternative	35
Earthquake Program	36
Earthquake Program is FEMA Funded	36
Emphasis Depends on Zone Designation and Available Time	36
Program Effectiveness Could be Improved	37
Preparedness Phase	37
What is Preparedness?	37
State Emergency Operations Plan	38
Many Agencies Involved in State EOP	39
State EOP Revision and Update	39
<i>Conclusion: State EOP Update Progressing</i>	40
Training	40
Use of Staff for Training	40
Professional Development Versus Functional Courses	41
Training Centralization	42
Community Training Used	42
Summary: Training Program Review is Warranted	42
Flood Task Force and Preparedness	43
<i>Conclusion: Flood Task Force Preparation Effective</i>	43
Response Phase	44
What is Response?	44
Resource Lists	44
Resource Lists are Out-of-Date	45
Resource List Distribution	45
<i>Conclusion: Tailor Resource Lists to Jurisdiction Needs</i>	45
State Emergency Coordination Center	46
DES Duty Officers	46
<i>Conclusion: ECC and Duty Officers Responsive</i>	46
Recovery Phase	47
What is Recovery?	47
Documentation of Damage is Key to Recovery Assistance	47
Staff Expertise	48
<i>Conclusion: Recovery Phase Requirements are Effective</i>	48
Chapter V - District Representatives	
Introduction	49
Montana has Four DES Districts	49
District Representatives Advise and Assist	50
District Representative Emphasis	50
Capability Affected by Area of Coverage	51
District Representatives are Focal Point for Requests for Assistance	51

Table of Contents

Area of Coverage Should be Reduced	52
Role Definition also Needed	52
Identify FTE for District Representative Requirements	53
Department Agrees with Recommendation	53
 Agency Response	
Department of Military Affairs	57

List of Figures & Tables

<u>Figure 1</u>	Disaster and Emergency Services Organization	15
<u>Figure 2</u>	Montana Disaster and Emergency Services Districts	50
<u>Table 1</u>	Public Infrastructure Assistance 1997 Presidential Declaration	11
<u>Table 2</u>	Disaster and Emergency Services Expenditures	17
<u>Table 3</u>	Emergency and Disaster Fund State versus Federal Funds (Fiscal Years 1995-96, 1996-97)	18
<u>Table 4</u>	County Disaster and Emergency Services FTE (As of December 1997)	22

Administrative Officials

**Department of Military
Affairs**

John E. Prendergast, Adjutant General

Jim Greene, Administrator
Disaster and Emergency Services Division

Report Summary

Introduction

The Legislative Audit Committee requested a performance audit of the Disaster and Emergency Services (DES) Division, Department of Military Affairs (DMA). Overall, we found DES is in compliance with statutory requirements. Our audit objectives addressed the four phases of emergency management.

Mitigation Phase - Is hazard identification and mitigation an effective part of the disaster and emergency management process in Montana?

Preparedness Phase - Are planning, training, and exercise procedures in place to prepare for incidents, emergencies and disasters?

Response Phase - Are procedures in place to respond to public safety needs and effectively use available resources during incidents, emergencies and/or disasters?

Recovery Phase - Are processes, criteria and controls in place to assure efficient and effective use of available financial assistance resources following an incident, emergency, or disaster?

Background

Statute defines an emergency as the imminent threat of a disaster causing immediate peril to life or property that timely action can avert or minimize. Disaster is the imminent threat of widespread or severe damage, injury, or loss of life or property resulting from natural or man-made causes. An incident is an event which includes the threat of an emergency.

Local Jurisdictions Responsible

Section 10-3-401, MCA, requires local jurisdictions, either counties or municipalities, to prepare local disaster and emergency plans which identify responsibilities, chain of command, evacuation procedures, and control to and from an emergency or disaster area. Currently, Montana has 56 county disaster and emergency services programs. Incorporated municipalities within county boundaries enter into agreements with the county for disaster and emergency services planning and operations coverage. County officials are responsible for initial response to emergencies and disasters through police, fire, medical, and other emergency services agencies within the county's boundaries. County disaster and emergency services agencies are responsible for the coordination necessary to provide

Report Summary

sufficient resources to minimize the effect of a disaster or emergency.

Emergency or Disaster Declarations

Incident, emergency, or disaster declarations may be issued by the chief executive official of a local jurisdiction, including county commissioners and mayors of incorporated municipalities. The effect of a declaration order is to activate the local emergency operations plan which authorizes officials to use resources and request assistance.

When events require expenditures in excess of existing operating budget, local officials can request a state declaration of emergency or disaster to obtain state assistance funding. Sections 10-3-302 and 303, MCA, empower the governor to declare an emergency or disaster to activate the Montana Emergency Operations Plan which authorizes the use of state-controlled resources. For local jurisdictions to receive federal assistance for public infrastructure damage, the president must declare an emergency or disaster. The governor submits requests for presidential declarations through the Federal Emergency Management Agency (FEMA).

Disaster and Emergency Services Division

The division is responsible for preparing and maintaining a comprehensive state emergency operations plan. The plan should be coordinated with disaster and emergency plans of the federal government, other states, state departments and agencies, local jurisdictions, and Canada. The mission of DES is to provide leadership for development of an emergency operations system to save lives, alleviate suffering, protect the environment, and reduce damage.

To support state-wide coordination and responsiveness, DES has both centralized and decentralized staff activities. Helena-based staff respond to requests for assistance and resources from local jurisdictions during all four phases of emergency and disaster operations. DES divided the state into four districts with a DES representative assigned to each district. District representatives work with and advise county and municipal officials within their district.

Report Summary

Audit Assessments and Recommendations

During the audit, we developed assessments of the four phases of emergency management. The four phases are:

Mitigation -- eliminate or reduce the probability of an emergency or disaster.

Preparedness -- adequate response, assure warning, stockpile supplies, survey facilities, and minimize damages.

Response -- shelter, medical care, security, search and rescue, and reduce damage.

Recovery -- damage assessment, assistance requests and referral, and planning and redevelopment.

The report also includes five recommendations for improving operations and effectiveness. In this summary, the recommendations are listed after the emergency management phase most affected by the recommendation. Our assessments and recommendations are addressed in the following sections.

Mitigation Phase Assessment

Hazard mitigation efforts are limited and the program could be more effective.

To assess mitigation phase activities, we examined hazard identification and risk analysis procedures, reviewed federal funding through the Hazard Mitigation Grant Program (HMGP), and evaluated DES staff program administration activities.

We found some counties require assistance with hazard identification to update local risk analyses. We conclude DES could increase assistance to local jurisdictions by restructuring district boundaries and increasing the number of district representatives.

We found the primary source of funding for county mitigation projects is federal funding made available to local jurisdictions through HMGP. As a result of flood disasters, Montana qualified for presidential declarations in 1996 and 1997 and received HMGP funding for public infrastructure mitigation projects. However, unless the state qualifies for a presidential declaration, mitigation funding is not available. We recommend DES examine alternatives

Report Summary

for development of a cost effective state hazard mitigation program and seek revision to statute if warranted.

During review of staff activities, we determined the FTE position designated for the earthquake awareness program could be more effectively used for other DES requirements. To increase staff resource effectiveness, we recommend the division re-evaluate the designation of Helena-based staff to centrally administer the earthquake awareness program.

Preparedness Phase Assessment

Preparedness phase activities are effective, but could be improved.

To assess preparedness phase activities, we examined procedures used by staff and local officials to review and update state and local emergency operations plans, reviewed the process for planning, scheduling, and conducting exercises, and evaluated the approach used by DES to provide emergency management training to local jurisdictions.

During our review of the process for review and update of local emergency operations plans, county officials described plans as not useful and out-of-date. We conclude DES could increase assistance to local jurisdictions in this area by restructuring district boundaries and increasing the number of district representatives.

We found the basis for planning, scheduling, and conducting emergency exercises is FEMA criteria requiring one exercise per year. The intent of the FEMA criteria was to assure a frequency which tested a wide range of local plans within a few years. However, we found counties unable to comply with the annual requirement because of the amount of time required to plan and schedule an exercise and the time required for real emergency and disaster events. We recommend DES develop criteria for determining the frequency of local exercises based on factors such as training required, available time of participants, actual emergency/disaster events, and local risks, resources, and capabilities.

Report Summary

Training is a major part of the preparedness phase. We identified three areas of concern: number of staff used for training, professional development versus functional courses, and centralization of courses. Staff capability to provide training instruction rather than work on other duties and responsibilities is a key factor tying all three areas of concern together.

During our review of staff activities, we found most staff were involved with some aspect of training. As a result, some staff could not focus on primary responsibilities such as project management and planning. We recommend DES evaluate alternatives which concentrate training responsibilities with fewer staff.

DES developed a combination of professional development and functional training courses. Functional training includes such things as defining position responsibilities for the incident response system. During the 1997 flood event, DES found there was a greater need for disaster-specific functional training. We recommend DES evaluate functional training for the highest risk disasters and establish a balance of training to meet the needs of local jurisdictions.

We noted, due primarily to funding limitations, DES increased the number of training courses presented in Helena. While more difficult to schedule, we concluded decentralized community training is a more effective approach for the majority of the training provided to local jurisdictions. We recommend the division review disaster and emergency services training program requirements and designate staff training responsibilities to maximize decentralized training.

Response Phase Assessment

Response phase activities are effective; coordination and assistance continues to improve.

To assess response phase activities, we examined state and local procedures to prepare lists of resources used during emergency and disaster events. We found resource lists in some counties were out-of-date and not useful. We conclude the division could better assist local officials with tailoring resource lists to meet individual county

Report Summary

needs. Restructured district boundaries and increased help from district representatives could improve assistance.

We also examined state emergency coordination center (ECC) operations and the activities of DES duty officers in Helena. We conclude the division established procedures to assure responsiveness to local jurisdiction requests for assistance and information during incidents, emergencies, and disasters.

Recovery Phase Assessment

Recovery phase programs are effective, reflecting improvement from 1996 to 1997.

To assess response phase activities, we examined state and local procedures for assessing infrastructure damage, tracking resource expenditures for making repairs, and recording and reporting information to meet state and federal timelines. We found DES combines the use of a procedures manual with on-going instruction to help local officials assure comprehensive information is compiled to support requests for state and federal infrastructure funding assistance. We also found DES record keeping and project monitoring facilitated the timeliness of providing state and federal assistance to local jurisdictions.

District Representatives

Currently, four district representatives are responsible for 13 to 16 counties each. District representatives work with and advise local officials to assist with development of disaster and emergency services programs and plans (mitigation-preparedness phases), and during emergencies and disasters when requested (response-recovery phases).

We noted examples of effective county disaster and emergency services programs across-the-state. However, local coordinators and district representatives identified program shortfalls in all four phases. We noted district representatives are not able to spend the time necessary to work with jurisdictions to help improve their programs. Distance and related travel time is the primary factor affecting the capability of district representatives to adequately cover their districts. To increase effectiveness, we recommend the division review district boundaries to reduce the area of coverage and

Report Summary

increase the number of district representatives. An increase in district representatives could be accomplished with existing staff resources. In addition, to improve assistance to local disaster and emergency services programs, DES should review and define the assistance role of district representatives for each phase of emergency management.

Chapter I - Introduction

Introduction

The Legislative Audit Committee requested a performance audit of the disaster and emergency services program in Montana. The audit covered disaster and emergency services activities for the Disaster and Emergency Services Division (DES), Department of Military Affairs, county and municipal governments, and many other state agencies.

Audit Objectives

In addition to providing the legislature information about statutory criteria and local, state and federal activities related to the four phases of emergency management, our audit objectives addressed the effectiveness of each phase.

Mitigation Phase - Is hazard identification and mitigation an effective part of the disaster and emergency management process in Montana?

Preparedness Phase - Are planning, training, and exercise procedures in place to prepare for incidents, emergencies and disasters?

Response Phase - Are procedures in place to respond to public safety needs and effectively use available resources during incidents, emergencies and/or disasters?

Recovery Phase - Are processes, criteria and controls in place to assure efficient and effective use of available financial assistance resources following an incident, emergency, or disaster?

Audit Scope and Methodologies

The audit was conducted in accordance with government standards for performance audits. The scope of this performance audit included:

- Providing information on the four phases of disaster and emergency management.
- Re-examining the roles of DES, other state agencies, and local political subdivisions as defined by statutes and administrative rules.
- Reviewing state agency and local jurisdiction activities related to expenditure of state General Fund and federal funds for disaster and emergency services.

Chapter I - Introduction

- Assessing procedures used by DES staff and district representatives to administer the four phases of disaster and emergency management.
- Examining procedures used by local disaster and emergency services coordinators/officials to administer the four phases of disaster and emergency management.
- Reviewing the administration and support of response capability for hazardous material incidents by the State Emergency Response Commission.

We did not review DES compliance with the following statutory requirements because of our focus on the four phases of emergency management:

- Functions required following an enemy attack and the federal declaration of a civil defense emergency.
- Filling a chief executive official vacancy and relocating the seat of government at the state and local level.
- Law enforcement support of a hostage or terrorist incident.

Methodologies

We examined plans to help assess the four phases of disaster and emergency management. The primary plans reviewed include:

- Montana Emergency Operations Plan
- Montana Hazard Mitigation Plan
- Hazardous Materials Incident Management and Response Support Plan (Draft)

DES Responsibilities

We examined the duties and responsibilities of 15 DES staff assigned to the central office in Helena. We reviewed file documentation and conducted interviews to determine individual roles and responsibilities regarding agency support of the four phases of emergency management. Through interviews, we reviewed duties and responsibilities of the four DES district representatives to compare differences and similarities between the districts. We also evaluated efficiency and effectiveness associated with providing assistance to local jurisdictions during the four phases.

Chapter I - Introduction

Through observation, staff interviews, and review of plans, we examined procedures used by DES for operations in the state emergency coordination center. Throughout the audit, we observed preparation, response, and recovery phase activities related to local, state, and presidential disaster declarations for 1997.

We reviewed hazard mitigation, hazardous materials, arson, terrorism, and earthquake awareness files to examine processes used by DES to award federal grant funding to county programs. We reviewed grant application, award, and expenditure monitoring procedures.

County Activities

We examined the activities of county disaster and emergency services coordinators associated with the four phases by interviewing 18 coordinators responsible for 21 counties. We identified local procedures for analysis of risks and hazards, preparation and update of emergency operations plans, development of exercises, identification of resources, and documentation of damage. We also sent a memorandum advising all local coordinators of our audit and requested input regarding concerns or issues.

Program Funding

We reviewed agency funding (state General Fund and federal funds) available for support of the four phases. We examined the criteria and workload requirements included in the annual Cooperative Agreement between DES and the Federal Emergency Management Agency (FEMA). The agreement provides the basis for receipt of federal funding.

Through file reviews and staff interviews, we examined the procedures used to allocate and distribute federal emergency management funding to counties. We reviewed the agreements between DES and counties used to allocate funding to the local jurisdictions. We also interviewed agency staff and local officials to evaluate the process used by the division to identify local program requirements and allocation of federal funding to local jurisdictions.

Chapter I - Introduction

State Emergency Response Commission

To determine the responsibilities of the State Emergency Response Commission (SERC), we reviewed hazardous material incident statutes, read SERC meeting minutes, interviewed DES staff, and interviewed a sample of SERC members. We also sent a memo advising all SERC members of our audit and requested their input regarding concerns or issues.

Report Organization

In the remainder of Chapter I, we present our assessment of regulatory compliance and list management memorandum issues. In Chapter II, we provide background information on disaster and emergency services statutory requirements and division operations. Chapter III discusses county programs and activities. Chapter IV presents our assessments of the four phases of emergency management. Chapter V addresses the role and capabilities of DES district representatives.

DES in Compliance

We examined compliance with statutes and administrative rules pertaining to DES programs. Our audit work indicates DES is generally in compliance with the statutory requirements outlining overall division responsibilities such as:

- Advising and assisting jurisdictions in disaster and emergency services.
- Making recommendations on the formation of interjurisdictional areas.
- Periodically reviewing local and interjurisdictional plans and programs.
- Developing or assisting local jurisdictions with mutual aid agreements.
- Instituting training and public information programs.
- Directing emergency response, disaster preparation and disaster response and recovery activities authorized by the governor.

We also determined the SERC is in compliance with Montana statutory requirements to implement a state hazardous materials

Chapter I - Introduction

incident response program and assure adequate hazardous material incident response capability exists statewide.

Management Memorandum

During the audit, we noted some minor issues relative to other issues addressed in this report. We presented informal recommendations to the division on these topics, which if adopted could result in operating improvements. A management memorandum was sent to the department concerning the following:

Reimbursement of Travel Funds -- Local coordinators are concerned about the amount of time required to process requests for reimbursement of expenses for state-sponsored training and conferences. The department should review procedures to assure claims processing time is minimized.

Disaster and Emergency Services Versus Emergency Management -- Across the state, two views of DES activities have evolved and these two views are reflected in frequent discussion of the need to change state and local agency titles. One view focuses on coordination and participants prefer the disaster and emergency services agency title. Others emphasize resource management and prefer the emergency management agency title. DES should take a position regarding the need for a state agency title change. County agency titles should be decided by local officials.

Training Schedule -- Local coordinators and district representatives were concerned about including local training requirements in the annual work agreement between DES and county officials. The dates for review and approval of the agreement do not match the timing DES established for identifying and scheduling training. As a result local coordinators are asked to agree on training which may not be available. DES should review the timing of these two processes to improve coordination.

Designate Staff for Emergency Coordination Center (ECC) Assignment -- DES staff are used to fill functional position requirements when the state ECC is activated depending on the needs of the event and the level of activation. Specific staff designation for ECC duties is not pre-determined and scheduled, so some staff do not participate. DES should pre-assign staff for ECC response phase requirements to assure adequate training in advance of and coverage during a disaster or emergency event.

Chapter I - Introduction

Emergency Information and Geographic Information Systems --
DES designated one staff member to review Emergency Information System software to determine if the capability of this system could increase efficiency or the effectiveness of state and local programs. Similarly, staff are reviewing geographic information system capabilities for application to state and local emergency and disaster programs. The division has not developed milestones or work plans for these projects. DES should establish work plans and milestones for review of both systems to assure staff are used for the highest priorities within the division.

Radiological Defense -- FEMA has decreased program emphasis and eliminated federal funding in the area of radiological defense. DES is evaluating options to maintain a minimum capability at the county level. DES should continue this approach and consider alternative assignment of this position for higher priority division requirements.

Chapter II - Background

Introduction

Statute defines emergency as the imminent threat of a disaster causing immediate peril to life or property that timely action can avert or minimize. Disaster is defined as imminent threat of widespread or severe damage, injury, or loss of life or property resulting from any natural or man-made cause. An incident is an event which includes the threat of an emergency. All three, emergency, disaster and incident, may be caused by an individual or natural phenomena and require action by disaster and emergency services personnel to prevent or minimize loss of life or damage to property or natural resources.

The following lists the statutorily designated causes of emergencies, disasters, or incidents.

Tornadoes	Windstorms	Snowstorms
Wind-driven Water	High Water	Floods
Wave Action	Earthquakes	Landslides
Mudslides	Volcanic Action	Fires
Water Contamination	Air Contamination	Blight
Explosions	Droughts	Infestations
Riots	Sabotage	Hostile Military Action
Disruption of State Services	Radiation Accidents	Hazardous Materials

Statute Provides for Four Phases of Emergency Management

Section 10-3-101, MCA, outlines several goals of emergency management:

- Provide for prompt and timely reaction to an emergency or disaster.
- Insure preparation for emergencies or disaster.
- Provide for the common defense.
- Protect the public peace, health, and safety while preserving lives and property.

To achieve these goals, statute establishes an emergency and disaster management system using four principles. These principles are referred to as the four phases of emergency management. The four phases are intended to:

1. Mitigate hazards to reduce or eliminate damage.
2. Prepare for disasters not mitigated.
3. Respond to disasters.
4. Recover from disasters.

Chapter II - Background

In this chapter, we provide background information on statutory requirements and state agency organization and responsibilities in support of the four phases of emergency management. The final section of the chapter addresses the role of the State Emergency Response Commission.

Local Jurisdiction Responsible

Section 10-3-401, MCA, requires local jurisdictions, either counties or municipalities, to prepare local disaster and emergency plans to identify responsibilities, chain of command, evacuation procedures, and control to and from an emergency or disaster area. Currently, Montana has 56 county disaster and emergency services programs. Incorporated municipalities within county boundaries enter into agreements with the county for disaster and emergency services planning and operations coverage. By statute, each county designates a local disaster and emergency services agency responsible for mitigation, preparedness, response and recovery. County officials are responsible for initial response to emergencies and disasters by police, fire, medical, and other emergency services agencies within the county's boundaries.

Mutual Aid Agreements

Section 10-3-202, MCA, encourages political subdivisions, with the assistance of the Disaster and Emergency Services Division (DES), to enter into mutual aid agreements with other public and private agencies within Montana for reciprocal aid and assistance in coping with emergencies and disasters. According to local coordinators, most mutual agreements are between specific response entities such as fire districts. Some entities bill the requesting jurisdiction for services provided, others do not bill and assume reciprocating support in the future. The most recent legislative changes allow local officials to request resource assistance from adjoining jurisdictions without a formal mutual aid agreement.

Local Emergency or Disaster Declaration

Local incident, emergency, or disaster declarations may be issued by the chief executive official of a local jurisdiction. Officials include county commissioners and mayors of incorporated municipalities. Although part of a county program, municipal officials issue their own emergency and disaster declarations. The effect of a declaration order is to activate the local disaster and emergency operations plan which authorizes officials to use resources and request assistance.

Chapter II - Background

Local declaration orders also advise DES of the potential local resources could be exceeded and requests for assistance and state resources may be forthcoming.

Emergency Mill Levy

To pay expenses associated with response to or recovery from emergencies and disasters which exceed available operating budgets, section 10-3-405, MCA, authorizes local jurisdictions to collect an emergency mill levy. The levy requires a unanimous vote of commissioners and cannot exceed 2 mills. The levy can only be used for expenses related directly to emergencies or disasters declared by local officials.

Governor's State Declarations

Before state disaster assistance funds can be used, jurisdictions must exhaust funding available from an emergency mill levy and demonstrate a lack of financial capability to respond to and recover from the emergency or disaster. When events require expenditures in excess of existing operating budget and any emergency levy from previous years, local officials can request a state declaration of an emergency or disaster to obtain state assistance funding.

Sections 10-3-302 and 303, MCA, empower the governor to declare an emergency or disaster to activate the Montana Emergency Operations Plan which authorizes the use of state-controlled resources. For the 1996-97 winter storm and flood event, 58 municipal and county emergency and disaster declarations were issued by local officials. The governor issued six executive orders for emergency declarations between December 1996 and July 1997.

When priorities warrant, available resources include access to Montana National Guard personnel, equipment and supplies as well as other state agencies' resources. A state declaration of an emergency or disaster also authorizes expenditures from the state General Fund. Section 10-3-312, MCA, appropriates up to \$2.0 million during each biennium for state declarations of emergencies and disasters. These funds can be used to meet contingencies and repair damage to state, county or municipal infrastructure (public works, roads, or buildings) and protect health, welfare, and safety of Montana's citizens. Section 10-3-310, MCA, also appropriates \$10,000 per incident up to \$100,000 to the Office

Chapter II - Background

of the Governor from the General Fund for the biennium for state incurred response costs.

Whether or not the governor issues an executive order for an emergency or disaster declaration, municipal and county chief elected officials are responsible for local emergency and disaster response activities. Following a local and a state declaration, DES coordinates assistance and resource requests and prioritizes allocations among jurisdictions if necessary.

Federal Assistance Requires Presidential Declaration

The president must declare an emergency or disaster for local jurisdictions to receive federal assistance for public infrastructure. The governor submits requests for presidential declarations. For Montana, presidential requests are processed through the Federal Emergency Management Agency (FEMA) Region VIII office in Colorado and through FEMA headquarters in Maryland before reaching the president. Montana had two presidential declarations approved in 1996 for flood-related disasters. The president also approved a declaration for Montana flooding in 1997. Prior to 1996, the last presidential declaration for Montana occurred in 1986.

Federal Assistance does not Require Emergency Levy

Unlike state disaster assistance, federal public infrastructure assistance funding does not require local jurisdictions to expend the equivalent of a two mill levy. FEMA criteria requires local (and/or state) funding for 25 percent of project cost. If the local jurisdiction can cover the 25 percent, state assistance funding is not used. When local funding cannot cover the 25 percent, the jurisdiction has to reflect local expenditures equivalent to a 2 mill levy. The state provides the difference between the mill levy and the 25 percent requirement from the \$2.0 million of General Fund appropriated to the Office of the Governor. Approved public infrastructure repair and replacement projects frequently include a combination of FEMA, state, and local funding. The department is responsible for distribution of FEMA assistance funding to counties and municipalities for approved projects.

Chapter II - Background

Other Entities Qualify

County and municipal governments are not the only entities which qualify for federal public infrastructure assistance. Other entities include irrigation and fire districts, emergency, medical and safety service organizations, education facilities, utility cooperatives, state agencies, and other private/non-profit organizations. In addition, Indian reservations are eligible for federal assistance. The department is also responsible for distribution of assistance funding to these other entities.

Presidential Declaration Funding

The following table shows the information available at the time of our audit for public infrastructure costs and cost shares associated with the presidential declaration in 1997. Disaster assistance for this declaration included a wide variety of counties, municipalities, and other entities.

Table 1

**Public Infrastructure Assistance
1997 Presidential Declaration**

	Total Cost	Federal Share	State/Local Share
Counties (23) and Municipalities (14)	\$3,732,920	\$2,799,690	\$ 933,230
Private/Non-Profit (43)	1,757,704	1,318,278	439,426
State Agencies (3)	302,688	227,018	75,670
Indian Reservations (2)	217,466	163,100	54,366
Total	\$6,010,778	\$4,508,086	\$1,502,692

Source: Compiled by the Legislative Audit Division from DES records.

Chapter II - Background

Federal Assistance Process

FEMA is notified when DES staff start to gather damage information and the governor considers whether to apply for a presidential declaration. FEMA responds by assisting state and local officials with on-site preliminary damage and cost assessments. This information is used to show emergency and disaster conditions, potential damage, and cost in the governor's request to the president. Both the request by the governor and the presidential declaration identify affected counties and municipalities. Following declaration by the president, FEMA staff remain in Montana and assist with local jurisdiction damage survey reports used to support formal application for public infrastructure project funding.

Public Assistance Officer Designated

Following a governor or presidential declaration, DES designates one staff as a public assistance officer (PAO) responsible for providing guidance and direction to local jurisdiction officials when applying for state and/or federal assistance. PAO activities include assisting local officials with damage assessment and determination of repair and/or replacement options and costs. The PAO continues to monitor local projects until complete. The PAO tracks expenditures and assures timely reimbursement to local jurisdictions qualifying for state and/or federal assistance.

Federal Individual and Family Assistance

In addition to public infrastructure funding, a presidential declaration permits a wide range of federal response and recovery assistance. In Montana, statutorily designated appropriations for emergencies and disasters are not available for individual or family assistance. However, for the state to qualify for federal individual assistance, statute authorizes \$500,000 in a biennium for the state to match available federal individual assistance funding. In Montana the most common disasters are fire or flood related. Typically, these disasters affect rural areas and do not impact the number of households required to justify federal individual assistance funding. Examples of assistance funding available from FEMA should the state qualify include: funding for temporary housing, community loans, and reimbursement for debris removal.

While FEMA is the primary source for federal assistance following a presidential emergency or disaster declaration, other federal agencies such as the Army Corps of Engineers, Federal Highway

Chapter II - Background

Administration, Small Business Administration, Veterans Administration, Department of Agriculture, Department of Health and Human Services, and Department of Labor as well as many other agencies have programs for disaster response and recovery assistance.

Individual Assistance Officer Designated

To respond to requests for individual assistance, DES designates one staff as an individual assistance officer (IAO). During and after Montana disasters, the IAO provides assistance to individuals and businesses in the form of referrals to state and federal agencies.

Disaster and Emergency Services Division

Section 10-3-105, MCA, establishes the DES Division within the Department of Military Affairs to support the four phases of emergency management. The department, through DES, is responsible for planning and program development for state disaster and emergency services. The division is responsible for preparing and maintaining a comprehensive state emergency operations plan coordinated with disaster and emergency plans of the federal government, other states, state departments and agencies, local jurisdictions, and Canada.

According to statute, DES is responsible for:

- Advising and assisting jurisdictions in disaster and emergency services.
- Making recommendations on the formation of interjurisdictional areas.
- Conducting surveys of public and private industries, resources, and facilities in the state, to assess risks, mitigation and preparedness.
- Periodically reviewing local and interjurisdictional plans and programs.
- Developing or assisting local jurisdictions with mutual aid agreements.
- Instituting training and public information programs.

Chapter II - Background

- Directing emergency response, disaster preparation and disaster response and recovery activities authorized by the governor.

Disaster and Emergency Services Mission

The mission of DES is to provide leadership for development of an emergency operations system to save lives, alleviate suffering, protect the environment, and reduce property damage. The system incorporates the four phases of disaster and emergency management. Since disaster and emergency services are a local responsibility, DES focuses on coordination of a comprehensive program state-wide. DES management established goals to make the division responsive to local requests for advice and assistance.

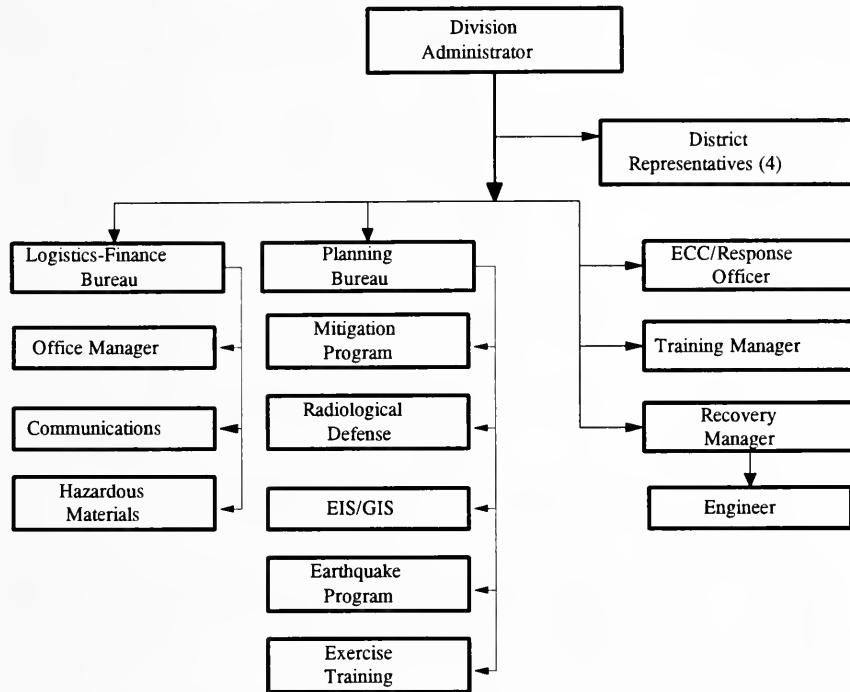
DES Staff and Programs

To support state-wide coordination and responsiveness, DES has both centralized and decentralized staff activities. Helena-based staff respond to requests for assistance and resources from local jurisdictions during all four phases of emergency and disaster operations.

District Representatives Advise Local Jurisdictions

The state is divided into four districts and a DES representative is assigned to each district. District representatives work with and advise county and municipal officials within their district. The following figure reflects the DES organization.

Figure 1
Disaster and Emergency Services Organization



Source: Compiled by the Legislative Audit Division from DES information.

Chapter II - Background

Disaster and Emergency Services Funding

The DES budget includes two categories of funding: 1) Disaster and Coordination Response Fund -- used for day-to-day DES operations, and 2) Emergency and Disaster Fund -- used for state and presidential emergency and disaster assistance.

Cooperative Agreement between DES and FEMA

The primary budget source for day-to-day DES operations is FEMA grant funding. FEMA grant funding to DES is justified through an annual request known as the Cooperative Agreement. The Cooperative Agreement identifies DES goals and objectives for various categories of grant funding. As a result of the requirements in the Cooperative Agreement, DES submits applications for federal grant funding. FEMA allocates funding to states using a formula which considers previous year funding, state population and anticipated funding levels for the federal agency.

Grant Funding in Disaster Coordination Response Fund

Disaster Coordination Response funds are used by DES for personal services, operations, and equipment. Included in this category are federal grant programs administered by DES. In state fiscal year 1996-97, approximately 85 percent of the DES day-to-day operating budget, about \$3 million, was federal grant funding. The remainder was state General Fund. Approximately 80 percent of the FEMA grant funding, known as state and local assistance (SLA) is awarded to the state in two categories: 1) SLA 50/50 requires a 50 percent state and/or local match, and 2) SLA 100 does not require a match. Most SLA 50/50 and 100 funding is used for personnel salaries. The remainder is used for operating expenses such as training and information materials.

The other 20 percent of FEMA grant funding is designated for specific projects such as disaster preparedness improvement, hazard mitigation, hazardous materials, and earthquake awareness. The funding can be used for training, education, and awareness projects, as well as staff salaries, equipment and supplies. In addition to FEMA grants, DES receives funding through the U. S. Department of Transportation. These funds are used primarily for hazardous materials response training contracted through the Montana Extension Service Fire Services Training School.

Chapter II - Background

Emergency and Disaster Fund

The Emergency and Disaster Fund is authorized by the legislature for the governor to support public infrastructure and individual assistance associated with governor and presidential disaster declarations. Federal disaster assistance resulting from presidential declarations is deposited in the Emergency and Disaster Fund. Section 10-3-203 (2), MCA, authorizes the state to expend federal assistance funding.

Fund expenditure is based on emergency and disaster events, governor declarations and presidential declarations. For fiscal year 1995-96, Emergency and Disaster Fund expenditures totaled \$1.8 million, and for fiscal year 1996-97 fund expenditures exceeded \$2.5 million.

The following table shows Disaster Coordination Response and Emergency and Disaster Fund expenditures for fiscal years 1995-96 and 1996-97.

Table 2

Disaster and Emergency Services Expenditures

	Fiscal Year 1995-96		Fiscal Year 1996-97	
	Coordination Response	Disaster Fund	Coordination Response	Disaster Fund
Personal Services	\$ 660,407	\$ 438,784	\$ 705,494	\$ 300,622
Operating Expenses	144,102	141,599	200,894	16,873
Equipment	22,277	4,023	29,602	399
Grants/Assistance	<u>719,255</u>	<u>1,215,432</u>	<u>621,682</u>	<u>2,188,052</u>
Total	<u>\$1,546,041</u>	<u>\$1,799,838</u>	<u>\$1,557,672</u>	<u>\$2,505,946</u>

Source: Compiled by the Legislative Audit Division from SBAS.

Chapter II - Background

Table 3 identifies the portion of the Emergency and Disaster Fund which is state General Fund versus federal assistance funds provided through FEMA. For 1995-96 FEMA provided 60 percent of the total assistance funding distributed by the department and for 1996-97, 72 percent.

Table 3

**Emergency and Disaster Fund
State versus Federal Funds
(Fiscal Years 1995-96, 1996-97)**

	<u>1995-96</u>	<u>Percent</u>	<u>1996-97</u>	<u>Percent</u>
General Fund	\$ 712,003	40	\$698,927	28
Federal Assistance	<u>1,087,925</u>	<u>.60</u>	<u>1,807,125</u>	<u>.72</u>
Total	<u>\$1,799,928</u>	100	<u>\$2,506,052</u>	100

Source: Compiled by the Legislative Audit Division from SBAS.

State Emergency Response Commission

As required by federal statute and section 10-3-1204, MCA, a State Emergency Response Commission (SERC) was established to implement the requirements of Montana's hazardous materials incident response program. Statute requires the SERC to assure adequate hazardous material incident response capability exists statewide. In addition, the SERC is responsible for coordinating and controlling state and local emergency response to hazardous materials incidents.

Like other incidents, emergencies or disasters, local agencies respond to hazardous materials incidents within their area of jurisdiction. Assistance from other jurisdictions or state agencies in support of a hazardous material incident occurs through existing mutual aid agreements or may be requested through the state Emergency Coordination Center based on a declaration of a hazardous material incident emergency at the local level. Statute also authorizes response agency officials to request assistance from

Chapter II - Background

owners or transporters of hazardous materials as well as landowners in the area of the incident.

Hazardous Material Response

The SERC is preparing a Montana Hazardous Materials Incident Management and Response Support Plan. Division staff, SERC members, state agency staff, and local jurisdiction response representatives assisted with preparation of the draft response plan. The plan will provide for regional support of hazardous materials incidents when resource requirements are beyond local capabilities.

Oversight of Local Emergency Planning Committee

Per federal statute, the SERC is responsible for oversight of Local Emergency Planning Committees (LEPC). We describe the use of LEPCs in Chapter III. Federal statute requires LEPCs to identify hazardous materials and develop local response plans. These federal requirements stem from the Emergency Planning and Community Right-to-Know Act of 1986.

Annual Plan Review by District Representatives

DES oversees annual review and exercise of local emergency operations plans for hazardous materials incidents. The purpose of the annual hazardous materials incident plan review by DES is to ensure coordination of each jurisdiction's plan with other jurisdiction plans as well as the state plan. DES includes this review as part of the emergency operations plan review responsibilities assigned to district representatives.

Chapter III - County Disaster and Emergency Services

Introduction

Local jurisdiction disaster and emergency services agencies are responsible for coordination necessary to provide sufficient resources to minimize the effect of a disaster or emergency. Response to disaster or emergency events is the responsibility of local law enforcement, fire, or medical agencies. When the requirements of the event exceed the resources of the local response agency, communication and coordination are necessary to:

- Identify resource needs.
- Determine resource availability and/or alternatives.
- Obtain and efficiently deliver the resources to the right location.

Ideally county disaster and emergency services agencies work on this coordination in advance of an emergency or disaster to assure effective communication occurs during the event.

During the audit, we observed county operations and activities across the state. In Chapter III, we present conclusions on county practices which increase the effectiveness of the four phases of emergency management. In addition, we provide conclusions on areas of concern. These refer to our final audit recommendation in Chapter V which proposes Disaster and Emergency Services Division (DES) organizational restructuring to improve assistance to local programs. Chapter III also includes a recommendation concerning DES policy for scheduling exercises to verify emergency plans.

Local Coordinators

Statute requires counties to identify a disaster and emergency services agency administrator. In most jurisdictions, the title used is disaster and emergency services coordinator. Other jurisdictions in Montana use the title emergency manager. Local coordinators serve as an advisor to county commissioners for the four phases of emergency management. In addition to coordinating resource allocation for disasters and emergencies, other duties include development of emergency operations plans, scheduling exercises, and arranging for training.

As of December 1997, 11 coordinators were full-time equivalent (FTE) employees. The others were part-time, ranging from .10 FTE

Chapter III - County Disaster and Emergency Services

to .80 FTE. The following table indicates FTE for county programs.

Table 4

County Disaster and Emergency Services FTE
(As of December 1997)

<u>County</u>	<u>FTE</u>	<u>County</u>	<u>FTE</u>
Beaverhead	.50	McCone	.28
Big Horn	1.00	Meagher	.12
Blaine	.33	Mineral	.10
Broadwater	.30	Missoula	1.00
Carbon	.30	Musselshell	.46
Carter	.25	Park	.75
Cascade	1.00	Petroleum(1)	0
Chouteau	.50	Phillips	.25
Custer	.25	Pondera	.63
Daniels	.15	Powder River	.23
Dawson	.75	Powell	.75
Deer Lodge	.23	Prairie	.19
Fallon	.60	Ravalli	.75
Fergus	.50	Richland	.59
Flathead	1.00	Roosevelt	.50
Gallatin	1.00	Rosebud	1.00
Garfield	.18	Sanders	.40
Glacier	.50	Sheridan	.46
Golden Valley(3)	0	Silver Bow	1.00
Granite	.12	Stillwater	.25
Hill	.33	Sweet Grass	.46
Jefferson(1)	0	Teton	.80
Judith Basin	.25	Toole	0
Lake	1.00	Treasure(2)	0
Lewis and Clark	1.00	Valley	.50
Liberty(2)	.60	Wheatland(3)	0
Lincoln	1.00	Wibaux	.18
Madison	.29	Yellowstone	1.00

(1) In the process of hiring, no decisions on percent FTE.

(2) Includes Toole County.

(3) No designated coordinator.

**Source: Compiled by the Legislative Audit Division from
DES records.**

Chapter III - County Disaster and Emergency Services

County Consolidations

In three instances, county officials opted to use one local coordinator to oversee two county programs. These counties are: Fergus-Phillips, Liberty-Toole, and Fallon-Prairie. We interviewed the three coordinators as well as DES district representatives. In these counties, the designated local coordinator reports to county commissioners either as a county employee or through a contract. Commissioners retain responsibility for county program operations.

We found by using one coordinator to administer two jurisdiction programs, counties benefit from knowledge and experience of a coordinator who more closely approaches full-time, when neither county could individually support a full-time employee. We noted coordinators in these jurisdictions had a positive impact on preparedness phase activities and recently updated emergency operations plans and conducted exercises.

While counties can benefit from joint use of coordinators, there are potential negative aspects of such an approach. For example, travel time increases with size of the area of responsibility and coordinators must become familiar with two sets of risks/hazards, local officials, response agencies, and available resources.

We also observed one other approach to program consolidation. By consolidating fire, police, and/or medical agency responsibilities with disaster and emergency services responsibilities, some counties increased program capabilities. While this approach can reduce coordination and communication requirements and increase efficiency, conflicts such as how to prioritize individual response agency activities are also possible.

Alternative Available to Local Officials

Local officials are responsible for disaster and emergency services activities within their jurisdictions. Local program implementation provides alternatives such as joint use of coordinators or consolidation of county activities.

Chapter III - County Disaster and Emergency Services

Conclusion: Consolidation an Effective Alternative

Consolidation of disaster and emergency services activities between and within counties are effective alternatives for administering local programs. Local officials could consider these alternatives to improve disaster and emergency services effectiveness and efficiency.

Counties Eligible for Federal Funding

DES administers the distribution of Federal Emergency Management Agency (FEMA) grant funding to assist counties in developing and maintaining local disaster and emergency services. The intent of federal funding is to make it easier for local jurisdictions to establish coordinated emergency management capabilities.

DES uses a formula to allocate FEMA grant funding to local jurisdictions. Typically, FEMA grant funding provided by DES to counties is used to support a portion of the salary and benefits of the designated local disaster and emergency services coordinator. In most counties, this approaches 40-45 percent of the total salary whether part-time or full-time. The remainder of salary and disaster and emergency services agency operations budget is a county responsibility.

Annual Statement of Work

An annual statement of work is an agreement between DES and county officials used to qualify counties for an allocation of FEMA's grant funding for disaster and emergency services programs. The agreements identify local requirements such as emergency operations plan review/revision, training, and exercises. These are FEMA requirements and must be part of a local program in order for the county to qualify for a portion of the state's grant funding. Work requirements consider local coordinator availability (full or part-time) and the jurisdiction's capability to support an active program in all areas. While the agreement is primarily a funding justification document, in some counties it is used as a work plan and schedule.

Counties are required to submit bi-annual status reports, signed by chief elected officials, to DES through district representatives. The reports indicate completion of the requirements or reasons for delay. Actual emergency and disaster events, coordinator turnover, and FTE limitations account for most incomplete activities.

Chapter III - County Disaster and Emergency Services

Local Preparedness

Requirements identified in the annual work agreement between DES and the county are intended to assure local jurisdictions are prepared to respond to and recover from emergencies and/or disasters. Disaster and emergency services programs at the local level are based on an emergency operations plan (EOP), with annexes dedicated to specific disaster/emergency events such as evacuation, earthquake, wild land fire, or flood. From information in the EOP and annexes, response agencies develop standard operating procedures (SOP) which are used to document agency-unique response and recovery requirements.

Local Emergency Operations Plans

It is difficult to define a starting point for a complete rewrite of a local EOP. Most are in a constant review and rewrite process. According to local coordinators, a complete review of a basic plan and annexes is probably a two-year project for a full-time coordinator receiving outstanding support and cooperation from volunteers and responder agencies. The approach most frequently described by local coordinators for preparing or updating an EOP is:

- Prepare a draft plan or annex through a local planning committee.
- Plan and conduct an exercise to verify adequacy of the draft.
- Rewrite the plan/annex for discrepancies identified during the exercise.

According to district representatives and local coordinators, the process of coordinating with response agencies to assure participation in plan preparation is as important as the final plan or annex. We noted teamwork developed during the plan/annex drafting process serves as a basis for response coordination and communication during an emergency or disaster. When used effectively, this plan development process helps participants identify resources, capabilities, and priorities.

Chapter III - County Disaster and Emergency Services

Planning Committees Participate in the Process

Local jurisdictions use disaster planning committees to help develop and prepare local EOPs, specific disaster annexes, and SOPs. In most jurisdictions, these groups are volunteers from response agencies such as fire, law enforcement, and medical, but may include representatives of local industry and business.

To qualify for federal hazardous materials grant funding, local jurisdictions are required to form Local Emergency Planning Committees (LEPC). According to federal statute, LEPCs are responsible for identifying hazardous materials within a jurisdiction and developing local response plans. In many Montana counties, LEPC membership is the same as the local disaster planning committee used to update EOPs and annexes. Officials in some counties have effectively combined these two committee requirements and use one group for all disaster and emergency services requirements, including hazardous materials incidents. We noted other counties, particularly smaller and/or more rural, find it difficult to establish two committees and combining the two requirements helps jurisdictions complete preparedness phase activities such as EOP update and exercise scheduling.

Conclusion: Combined Committees Effective Alternative

Combining the disaster planning committee with the LEPC is an effective alternative for local jurisdiction disaster and emergency services programs.

Plans Require Update

During our audit, DES district representatives and local coordinators identified out-of-date EOPs and annexes indicating the documents would not be useful for an emergency. We found local coordinator and planning committee volunteer availability was the factor most often cited as the reason EOPs were out-of-date and revision delayed.

DES staff assigned to Helena are seldom involved in preparation or review of local EOPs. District representatives are more appropriately assigned this responsibility and follow local reviews and revisions as part of their responsibility to monitor annual work agreement requirements. District representatives assist with the revision/update process when requested by local officials.

Chapter III - County Disaster and Emergency Services

Generic FEMA EOP preparation guidance is available, but appears to be based on more urban/metropolitan programs. DES distributed a general outline indicating the types of annexes which could be included in a local EOP in Montana. Staff also provide copies of EOPs, annexes, and SOPs from Montana counties judged as thorough and complete, to those jurisdictions in need of plan, annex, or SOP update. Local coordinators indicated there was still a need for sample formats and outlines, particularly for portions of the basic plan which are not unique to individual jurisdictions.

Conclusion: Review Process could be Strengthened

DES could strengthen the process for review of local EOPs by providing technical assistance through district representatives. This would assure updates and revisions reflect local risks as well as resources and capabilities.

In Chapter V, we discuss the role of the district representative and include revision and update of local plans in our recommendation.

Emergency Operations Centers

Local officials designate an emergency operations center (EOC) which can be used to coordinate activities during the response and recovery phases of emergency management. In many instances, such as hazardous material spills, local EOCs may not be activated because the capabilities of responders such as fire departments or law enforcement are sufficient to control activities on-scene. For more serious events requiring resources beyond the capabilities of the jurisdiction, EOCs are usually activated to help assure coordination between jurisdictions and response agencies. In such cases, the state emergency coordination center in Helena could also be activated to assist and coordinate requests for available resources.

During emergencies or disasters requiring EOC operations, local coordinators typically serve as a liaison between response agencies requesting resources, as well as between county or municipal officials and the state emergency coordination center. DES district representatives are available and may be used to assist or advise in EOCs when requested by local officials.

Chapter III - County Disaster and Emergency Services

Local EOC Capabilities Vary	Many county EOC facilities were originally FEMA-funded and designed to support emergency operations during and after a nuclear attack. In addition to space for local officials and response agency staff, EOCs include communications and warning equipment -- radios, telephones, and computers. Many jurisdictions also have a mobile facility, usually a trailer, bus, or pickup camper used as an on-scene EOC.
------------------------------------	--

A few counties have limited EOC facilities and lack basics such as space for staff and/or radios and telephones. Other shortfalls noted during the audit included the lack of display boards or computers to track damage, resources, or expenses during a disaster event. Some counties lack adequate mapping of public roads, utilities, and facilities.

Conclusion: Emphasize Local EOC Needs

DES could strengthen the process for review of local EOC capabilities by providing technical assistance through district representatives. In recognition of local jurisdiction resource limitations, review emphasis should be on providing assistance to counties by focusing on the highest risks in the jurisdiction.

In Chapter V, we discuss the role of the district representative and include review of local EOC capabilities in our recommendation.

Conduct Emergency Plan Exercises

There are several purposes for conducting disaster and emergency services exercises:

- Training participants.
- Identifying resource requirements.
- Identifying requirements for designation of responsibility.
- Identifying the need for operating procedures.

Based on FEMA criteria, DES requires local coordinators to prepare a four-year plan for exercises to verify the adequacy or identify shortfalls in local EOPs and annexes. District representatives and local coordinators agree on exercise schedules through the annual work agreement process. FEMA required jurisdictions to exercise at least one emergency plan each year.

Chapter III - County Disaster and Emergency Services

Exercise Planning and Design Focuses on Teamwork

According to district representatives and local coordinators, just as for preparation of local EOPs, the process of planning, preparing and scheduling an exercise involving responder and support agencies is probably more important than execution of the exercise. We found teamwork, communication, and coordination during the planning phase increase the likelihood an EOP will be effective during an exercise or an emergency.

Exercise design and planning can be extensive. We noted examples of major exercises where design and planning took 18 months. The long term effort to prepare for these exercises meant the jurisdiction did not complete an annual exercise. According to local officials, despite the amount of time required, learning outcomes resulting in EOP revision and response agency SOP update following these exercises were positive.

Emphasis on Number of Exercises

Throughout the year, local coordinators make tradeoffs between:

- Planning effort necessary to prepare for an exercise.
- Emergency or disaster events which test plans.
- Emergency or disaster events which compete for available time of coordinators, responders and volunteers.

According to staff and local coordinators, the current annual exercise scheduling approach over-emphasizes completion of exercises during a 12-month period. For exercises to be effective, schedules should not be based on the traditional one or two per year criteria. Based on our audit observations, exercise scheduling should consider local risks and the need to prepare or verify response and recovery capabilities. Local coordinators and district representatives agreed with scheduling exercises based on local risk assessment and the need to verify capability.

Chapter III - County Disaster and Emergency Services

Revise Exercise Scheduling Criteria

To accommodate local resource limitations and to assure consideration of local risks and capabilities, DES should review existing criteria which requires annual exercises. DES should develop policy and criteria for local jurisdiction exercise activity to include consideration of jurisdiction and/or district-wide risks. DES criteria should also consider jurisdiction and district resources and capabilities to effectively plan and design an exercise because of the positive aspects of coordination and communication associated with the planning process.

Recommendation #1

We recommend DES develop criteria for determining the frequency of local exercises.

Criteria should consider:

- Need for exercise training.**
- Time required to prepare/schedule an exercise.**
- Actual events which verify plans.**
- Jurisdiction and/or district-wide risks, resources and capabilities.**

Chapter IV - Assessments of Emergency Management

Introduction

The four phases of disaster and emergency management are:

Mitigation -- eliminate or reduce the probability of an emergency or disaster.

Preparedness -- adequate response, assure warning, stockpile supplies, survey facilities, and minimize damages.

Response -- provide shelter, medical care, security, search and rescue, and reduce damage.

Recovery -- damage assessment, assistance requests and referral, and planning and redevelopment.

In this chapter, we discuss and evaluate each phase, identify concerns, and make recommendations. We begin each section with our assessment of phase effectiveness.

Mitigation Phase

For the mitigation phase, our audit objective asked the question: Are hazard identification and mitigation an effective part of the disaster and emergency services program in Montana?

Audit assessment: Hazard mitigation efforts are limited and the program could be more effective.

What is Mitigation?

According to Federal Emergency Management Agency (FEMA) criteria, a state mitigation program should include legislation for mitigation, hazard mitigation plans, land-use and building code involvement, hazard mitigation project administration, and coordination between local, state and federal agencies. Montana's mitigation statute is limited to two general references: 1) recommendations for prevention and preparedness measures designed to eliminate or reduce damage, and 2) prevent and minimize injury and damage.

At the state and local level, the meaning of mitigation is more specific. Mitigation steps include: 1) identify hazards, 2) assess individual risks and set priorities, and 3) develop plans or projects to reduce risk or damage. In addition to projects, education and awareness activities such as weather warning, flood plain

Chapter IV - Assessments of Emergency Management

management, building site selection, and building code application are all part of mitigation efforts.

For the mitigation phase, we address audit findings and present recommendations in three areas: local hazard identification and risk analysis, the State Hazard Mitigation Program, and the Disaster and Emergency Services Division (DES) earthquake program.

Mitigation Starts with Hazard Identification

To determine potential mitigation requirements, counties need to identify local hazards related to:

- Transportation arteries (hazardous materials)
- Rivers/streams (flooding)
- Dams (earthquake/flooding)
- Fire threats (loss of property/life)
- Industry (hazardous materials/fire)
- Weather (wind/drought/snow)

During our review of mitigation phase activities, some local coordinators identified county risk analyses which were out-of-date and in need of review. We found coordinator concerns focused on hazard identification, including: lack of local expertise to complete a review, reliance on volunteers which can delay analyses, and lack of funding to pay for specific expertise when necessary. According to local coordinators, successful risk analysis requires the support of local response agencies, area business/industry, and state agencies such as the Departments of Transportation, Fish, Wildlife and Parks, and Natural Resources and Conservation. DES district representatives indicated cooperation and coordination is time-consuming and success is not only dependent upon whether the local coordinator is full- or part-time, but frequently depends on whether response agency officials are paid or volunteers.

DES has not developed guidance to help local jurisdictions conduct hazard identification and risk analysis such as when or how often, how to assure thoroughness, who to use for expertise, and state agency assistance availability. DES staff recalled out-dated FEMA-developed hazard identification and assessment forms used in the past, but had not developed a replacement.

Chapter IV - Assessments of Emergency Management

Hazards and Risks Vary Between Counties

Variation of hazards and risks in each county makes it very difficult for DES to design a standard guidance package applicable to all counties. As a result, DES or other assistance has to be tailored to the municipality or county in need of a risk analysis. We noted district representatives work with county officials on hazards identification and risk analyses when requested and as time permits. We found this joint approach between local officials and district representatives provides the forum for helping jurisdictions tailor individual programs.

Conclusion: Tailor Local Risk Analysis Assistance

DES could strengthen the process for assuring up-to-date local hazards identification and risk analysis by providing assistance through district representatives.

In Chapter V, we discuss the role of district representatives and include hazard identification and risk analysis responsibilities in our recommendation.

Hazard Mitigation Grant Program

To support mitigation, FEMA provides funding equivalent to approximately 15 percent of public infrastructure assistance funding in a presidential declaration. The intent of Hazard Mitigation Grant Program (HMGP) funding, following a presidential declaration, is to provide a funding source for correcting infrastructure problems, and prevent future costly disasters. Until 1997, local jurisdictions required a presidential disaster declaration to access FEMA mitigation grant funding. In 1997, federal policy changed to allow local jurisdictions not covered by the presidential declaration to use HMGP funding awarded to the state. FEMA requires local jurisdictions to provide a 25 percent funding match to use HMGP funds. For 1996, approximately \$440,000 was available only to the 18 counties identified in the presidential declarations for hazard mitigation projects.

Chapter IV - Assessments of Emergency Management

Mitigation Position Responsibilities Evolving	A DES staff position was established in 1996 to administer HMGP when FEMA grant funding was made available. As a result, duties and responsibilities for this position are still evolving. Currently, one DES staff person helps by identifying candidate projects in jurisdictions, works with local officials on applications, and monitors project progress and expenditures. DES management focused on assisting local jurisdictions with applications for projects which could be funded through the 1996 presidential declarations and on mitigation efforts to prepare for the 1997 flood event. On-going workload includes revision and update of the state hazard mitigation plan required by FEMA for the state to qualify for federal mitigation assistance.
Costs-Benefit is Complex	HMGP application procedures require a cost-benefit analysis which shows mitigation expenditures will off-set future recovery costs following repeat damage in another disaster. This analysis is used to justify HMGP funding. However, as a result of the cost-benefit analysis requirement, the application process is complex and time-consuming. One application we reviewed was initiated in the summer of 1996 and was still undergoing FEMA review in April 1997. The application package, for a culvert project estimated at \$16,000, exceeded 25 pages in length not including attached maps, drawings, and design specifications. We noted some local jurisdictions did not apply for available funds due to anticipated complexity.
	DES staff provided application preparation training to help local coordinators through the process. However, the uniqueness of each project requires many hours of local officials' time to adequately document cost-benefit analysis for FEMA. We found district representative involvement in the process is limited to specific requests for assistance during application processing.
	According to DES staff, FEMA revision of the grant application process has been underway for some time. The problem is not specific to Montana, and changes must include appropriate documentation and review of multimillion dollar projects associated with major earthquakes and hurricanes as well as Montana's lower cost flood-related requirements. Although procedural revisions are

Chapter IV - Assessments of Emergency Management

underway, FEMA does not anticipate less complex procedures in the near future because of the potential need for revision of federal statute.

Local Projects Identified

We asked local coordinators if mitigation projects were identified, but put on hold because local funding was not available. Many indicated projects were identified. Examples included drainage ditch redesign to assure water run-off, road build-up to avoid flooding, and culvert replacement to eliminate wash-out. However, coordinators indicated little planning or design work had been accomplished because funding was not anticipated. Local coordinators stated many of Montana's potential mitigation projects would address flood-related concerns and involve road, bridge, culvert, or drainage projects. Projects were generally categorized as low cost, in the \$10,000 to \$50,000 range.

We noted little progress on mitigation projects without the incentive of federal funding associated with a presidential declaration. Local coordinators suggested an incentive-based funding alternative would be necessary for Montana to pursue mitigation efforts which can save both local jurisdictions and the state future response and recovery costs, without incurring a presidential disaster declaration.

Funding Alternative

Since we determined funding was the key to local pursuit of mitigation projects, we examined alternatives for funding. Montana statute does not provide state funding for mitigation projects. Currently, the only alternative is to use local tax revenue. However, many priorities compete for this revenue. We discussed with DES the possibility of seeking legislation to allow the use of a portion of unused funds authorized to the governor for public assistance (\$2,000,000 per biennium) or individual assistance (\$500,000 per biennium). One alternative for this concept would set a limit on the use of these funds such as 5 or 10 percent of the balance at the end of a biennium. Existing statute would require revision to implement this alternative. Guidelines and administrative rules would be necessary to assure project application, review and approval procedures, and funding controls are in place.

Chapter IV - Assessments of Emergency Management

Recommendation #2

We recommend DES examine alternatives for development of a cost-effective state hazard mitigation program and seek revision to legislation if warranted.

Earthquake Program

Primarily an awareness program, DES's earthquake program is included in mitigation because of the potential for reducing damage to property and life through adequate education. The program emphasizes awareness of risks and preventative damage measures. The primary audience is public school officials and students, but training and information pamphlets are also provided to a variety of state and local agencies as well as private individuals and commercial businesses. Schools or businesses may also request assistance relating to preparation of disaster plans for response activities or recovery actions during and after an earthquake or other disaster event.

Earthquake Program is FEMA Funded

In the past, FEMA funding for this program required the designation of a staff position to administer the program. Recent FEMA initiatives suggest funding will be available without specific designation of a staff position. Currently, one full time staff supports the earthquake program by responding to requests for information and assistance from local coordinators, school officials, business, and state agencies. In some counties, the Helena-based DES program manager works directly with local school and/or school district officials. In others, information is provided to the local coordinator who works with schools or districts.

Emphasis Depends on Zone Designation and Available Time

We found the emphasis on earthquake awareness varied among jurisdictions. Local coordinators base the need to pursue an active earthquake program in their community on state designation of earthquake zones. Zone 4, the highest risk area, includes portions of: Beaverhead, Gallatin, Madison, and Park Counties.

According to local coordinators, available time is another factor which determines whether their county has an active earthquake program for public schools and/or other entities. Not all counties,

Chapter IV - Assessments of Emergency Management

even in Zone 4, track whether schools within their boundaries receive information or have developed appropriate earthquake disaster plans.

Program Effectiveness Could be Improved

District representatives do not track earthquake program activity within jurisdictions in their districts. The division should re-evaluate the designation of Helena-based FTE and the need for centralized administration of the earthquake awareness program. While a focal point in Helena may be necessary for coordination, decentralization of responsibilities to district representatives could be more effective. District representatives could work more closely with local officials and businesses in those counties where earthquake risk warrants an active program.

Recommendation #3

We recommend DES review the administration of the earthquake program to decentralize activities and increase staff resource effectiveness.

Preparedness Phase

For the preparedness phase, our audit objective asked the question: Are planning, training, and exercises procedures in place to prepare for incidents, emergencies and disasters?

Audit assessment: Preparedness phase activities are effective, but could be improved.

What is Preparedness?

Montana statutes have several references to the preparedness phase:

- Section 10-3-105 (3), MCA, coordinate state plan with local plans.
- Section 10-3-105 (4)(c), MCA, advise and assist political subdivisions.
- Section 10-3-105 (4)(f), MCA, periodically review local plans/programs.

Chapter IV - Assessments of Emergency Management

- Section 10-3-105 (4)(I), MCA, institute training and public information.
- Section 10-3-401, (1), MCA, prepare local plans to support state program.
- Section 10-3-401 (2)(a), MCA, identify responsibilities of local officials.

According to FEMA criteria, preparedness includes emergency operations plan review, emergency operations facility capability, assessments of training and exercises, and capability associated with mutual aid agreements between jurisdictions.

At the state and local level, the definition of preparedness involves the coordination required to:

- Develop emergency operations plans.
- Schedule and complete training to support plan requirements.
- Plan and conduct exercises to verify plan content and training.

Local coordinators, primarily in rural jurisdictions but in some urban areas as well, stressed the effectiveness of the preparedness phase is dependent upon the availability of volunteers to support planning, training, and exercises.

For the preparedness phase, we discuss audit findings related to the state operations plan and DES-managed training. In our Chapter III discussion of county programs, we addressed several other aspects of the preparedness phase: local emergency operation plans, exercises, and emergency operations centers, also aspects of preparedness.

State Emergency Operations Plan

According to section 10-3-301, MCA, the State Emergency Operations Plan (EOP) provides for:

- Prevention and minimization of injury and damage caused by disaster.
- Organizational control and prompt/efficient response.
- Emergency relief (evacuation, shelter, food, fire, and medical).
- Identification of areas vulnerable to disasters.

Chapter IV - Assessments of Emergency Management

	-- Coordination of federal, state, and local disaster and emergency activities.
Many Agencies Involved in State EOP	The role of other state agencies in disaster and emergency management is significant. The State EOP identifies many requirements dependent upon a coordinated effort among state agencies. Examples include:
	<u>Hazardous Materials</u> -- Departments of Public Health and Human Services (PHHS) and Environmental Quality (DEQ).
	<u>Evacuations</u> -- Departments of Justice, Transportation, Corrections, PHHS, and The Montana University System.
	<u>Food Distribution</u> -- PHHS and Office of Public Instruction.
	<u>Specialized Disaster Assistance</u> -- Departments of PHHS, Labor and Industry, Revenue, and Justice
	<u>Wildlands Urban Interface (fire)</u> -- Department of Natural Resources and Conservation.
	<u>Search and Rescue</u> -- Departments of Fish, Wildlife and Parks, Transportation, and Military Affairs.
State EOP Revision and Update	Latest revisions to the State EOP are dated 1994, although most are 1991. A significant reorganization involving public health and environmental control agencies occurred following the 1995 Legislative Session. We found annexes associated with these activities were out-of-date and did not reflect current organization and responsibilities. Annexes identify other state agency responsibilities and coordination between agencies.
	Priorities associated with 1996 and 1997 disaster declarations precluded DES work on the State EOP. As a result, DES staff expressed concern about the timeliness of the process used to assure updates to the State EOP annexes. Although many annexes are three to six years old, our audit review in this area indicates most state agencies are proceeding with updates and support the need for on-going review and revision. For example, we noted PHHS and DEQ prepared a memorandum of understanding to establish a basis for coordination between the two agencies.

Chapter IV - Assessments of Emergency Management

Conclusion: State EOP Update Progressing

State EOP update and revision is progressing adequately. DES continues to monitor updates and assist state agencies as necessary.

Training

Training is a major part of the preparedness phase. According to statute, DES is responsible for instituting training and providing information about the four phases of emergency management. In our discussion of training in this section, we identify three areas of concern: use of staff, professional development versus functional courses, and centralization of courses. These issues are not independent and all relate to the effectiveness of the DES training program. Staff capability to provide training instruction versus other duties and responsibilities is a key factor tying all three areas of concern together.

Use of Staff for Training

Our first area of concern focuses on the number of DES staff involved in training activities. One FTE is identified as the division training program manager. The manager is responsible for administering the training program for state and local jurisdictions including course development and scheduling. Another FTE is designated as the exercise training officer responsible for assisting local jurisdictions with exercise design and developing exercises at the state level to verify coordination between agencies. Due to the presidential declarations of 1996-97, and the utilization of the exercise training FTE on other priorities, DES has not fully implemented exercise training efforts.

Other Helena-based staff are also involved in training such as earthquake education, hazardous materials awareness, and hazard mitigation planning. We noted several Helena staff were used to develop and instruct the courses designed for flood preparedness, response, and recovery in 1997. Through discussion with staff, we found fluctuating training commitments impact their capability to focus on primary duties such as plan preparation, grant administration, and project management. As a result, DES should consider alternatives for concentrating training responsibilities with fewer staff.

We also observed district representatives, depending on their areas of expertise, instructing in Helena and in local communities. DES

Chapter IV - Assessments of Emergency Management

management emphasized the value of this approach, while cautioning the range of technical expertise was limited to the background of individual district representatives.

Professional Development Versus Functional Courses

Our second area of concern for training is related to the difference between professional development and functional courses. DES established a curriculum of traditional emergency management courses which are offered to state agency staff, local coordinators, and responders. Several of these courses, such as Introduction to Emergency Management and Emergency Planning are identified as core courses intended to provide professional development for staff and local coordinators. Staff, with the assistance of local coordinators, dedicate a significant amount of time to development and presentation of this series of courses.

DES also manages other courses such as Disaster Response and Recovery Operations and Incident Command System. These courses provide functional training relating more specifically to disaster events. For the 1997 flood season, DES developed and provided training to support anticipated local needs for flood events. DES management viewed these short-term training requirements as critical for 1997 flood preparation, response, and recovery phase activities. The training included: response and recovery planning, resource ordering, individual assistance alternatives, and flood hazard mitigation. These courses were not available in advance and were developed on short notice by staff when the risk of floods became apparent. We found the flood-related training was well-received at the local level. According to DES management, this approach to providing training was effective because of the pending emergency.

Management expects to use this experience to more appropriately balance the types of training available to local officials. We also believe more emphasis should be placed on the functional training needs of local jurisdictions.

Chapter IV - Assessments of Emergency Management

Training Centralization

A third training concern involves centralization of courses in Helena. According to staff, due to a continuing trend reflecting reduced federal funding used to support training requirements, DES decided to centralize a number of off-the-shelf emergency management courses in Helena. In making the decision to centralize, DES determined more training could be provided by using available training funding to pay mileage and per diem for attendees. The alternative, staff travel and local training, tended to be more one on one and not an efficient use of available DES staff resources.

During our audit, we found local coordinators recognized the funding issue related to centralized training in Helena. While DES established parameters for mileage and per diem to compensate for centralized training, coordinators suggested local elected officials do not always support centralization in Helena and begin to view training as excessive, because it pulls coordinators from primary duties in the county. We found part-time local coordinators, particularly those less than 0.5 FTE, could use a significant portion of available time traveling to/from Helena to attend a three or four day class.

Community Training Used

DES has used a community training approach in the past and anticipates continued use where possible. For many of the 1997 flood-related training courses, DES determined the most responsive approach was to send staff to local jurisdictions. However, according to staff, continued use of community training is dependent upon assurance of acceptable attendance numbers to justify staff time and expense. We believe decentralized community training is more effective for the majority of DES-managed courses.

Summary: Training Program Review is Warranted

The intent of FEMA funding, the primary source of money for DES-sponsored training, is to increase the operational capability of emergency management at the state and local level. To improve staff effectiveness, DES should review assignment of staff training responsibilities. To increase operations effectiveness, DES should assess course requirements to balance professional development and functional courses. Further, to assure decentralized training responsive to local needs, DES should designate training responsibilities for staff, including district representatives.

Chapter IV - Assessments of Emergency Management

Recommendation #4

We recommend the division review disaster and emergency services training program alternatives to:

- A. Determine a balance of professional and functional courses.**
- B. Designate staff training responsibilities to maximize decentralized training.**

Flood Task Force and Preparedness

Following heavy snowfall in November 1996 and based on National Weather Service snow fall and snow pack projections, DES management convened a Montana Flood Task Force in December 1996 to prepare for potential Spring 1997 flooding. The task force included federal agencies such as the Natural Resources Conservation Service and the Army Corps of Engineers. State agencies such as the Departments of Agriculture, Natural Resources and Conservation, and Transportation were also active task force participants. The task force met monthly through June 1997 to share resource information and compile data to assist local governments, private citizens and businesses with predicting flood severity. DES, with the support of task force members, focused on providing public awareness and flood preparation education and training.

The governor's executive order of March 1997 allowed for emergency funding for task force-identified preparedness and mitigation measures state-wide. During our audit, we found local officials supportive of the range and timeliness of initiatives resulting from the task force.

Conclusion: Flood Task Force Preparation Effective

The task force approach used by DES to highlight flood risk for 1997 was an effective alternative to help state and local jurisdictions prepare for potential emergencies and/or disasters.

Chapter IV - Assessments of Emergency Management

Response Phase

For this phase, our audit objective asked the question: Are procedures in place to respond to public safety needs and effectively use available resources during incidents, emergencies and/or disasters?

Audit assessment: Response phase activities are effective; coordination and assistance continues to improve.

What is Response?

Statute addresses response phase requirements in terms of: 1) clarifying and strengthening the roles of the governor, state agencies, and local governments and 2) providing for cooperation and coordination. DES is responsible for directing emergency and disaster response activities as authorized by the governor.

According to FEMA criteria, the response phase encompasses the compatibility of plans, preparation of disaster declaration information, assignment of responsibility, and procedures for emergency operations activation and resource allocation.

At the state and local level, response is discussed in terms of responsibility designation, which means conducting emergency or disaster response at the lowest level with the appropriate capability. Since response relies on plans, training, and resource identification, all completed during the preparedness phase, adequate response is dependent upon successful preparedness.

In the following sections, we address audit findings for resource lists and the state emergency coordination center.

Resource Lists

Resource lists are intended to provide information to allow local officials to efficiently allocate and effectively use resources. Resource lists identify equipment, personnel, and materials from local jurisdictions, the private sector and adjoining or higher government jurisdictions.

Chapter IV - Assessments of Emergency Management

Resource Lists are Out-of-Date

During our audit, district representatives, local coordinators and DES staff indicated the quality of county resource lists ranged from current and useful to out-of-date and not useful. While our review relied on local expertise to assess resource lists, we noted lists with dates indicating the most recent update was several years ago. We also observed “baskets” of materials intended to be compiled as a resource list. Formats vary by county, with some reflecting general categories such as contractor equipment while others reflect specific detail such as backhoes, including owner/operator, telephone number and location/address.

While some coordinators expressed a need for a standard format state-wide, others believe localized formats which reflect the difference in resources between urban and rural counties are more useful. We found the benefit of a resource list during a disaster or emergency event is its utility to local officials regardless of format. A county with a major urban center could develop a useful resource list by identifying government agency resources and using the urban-area telephone book yellow pages for private sector resources. The rural county typically requires a more complete list of government and private sector resources because most local resources are owned by individuals rather than business/industry.

Resource List Distribution

During the audit, discussion also focused on the need to take greater advantage of the opportunity to distribute resource lists, at least to adjoining counties. An awareness of resources in an adjoining county could preclude requests to DES, and reduce cost while increasing responsiveness. We noted examples of counties which automatically distribute updated versions of resource lists to adjoining jurisdictions.

Conclusion: Tailor Resource Lists to Jurisdiction Needs

To meet the specific needs of each jurisdiction, DES through district representatives could assist county officials with tailoring resources lists. District representatives could help local coordinators determine the need to distribute or receive resource lists.

In Chapter V, we discuss the role of district representatives, and include response phase resource list responsibilities in our recommendation.

Chapter IV - Assessments of Emergency Management

State Emergency Coordination Center

Command and control of State Emergency Coordination Center (ECC) activities is based on an approach known as the Incident Command System (ICS). ICS focuses on early identification of specific functional requirements to support an incident, emergency or disaster. For complex disaster events, impacting lives and property and requiring resources from outside the local jurisdiction, the number and types of functional ICS support staff requirements increases.

During the flood activity of 1997, we observed partial state ECC activation which included staff ICS requirements for operations, logistics, planning, and public information. To formalize ICS procedures initiated during 1996 and 1997 activations, DES management indicated the intent to develop an ECC handbook which would be used for training staff assigned to the ECC.

DES Duty Officers

When the ECC is not activated, DES assigns staff and district representatives as duty officers on a weekly basis. Duty officers respond to calls from private individuals, local government officials, and state/federal agencies in response to an incident, emergency or disaster. In line with DES management emphasis on customer service, staff recently completed a duty officer handbook to outline response procedures. During our audit, local comments about duty officer support were positive. Staff expressed some concern about their lack of expertise in areas such as hazardous materials spills and environmental considerations. However, staff were familiar with procedures for coordinating with other state agencies responsible for expertise in these areas. To address on-going training needs, management intends to focus on updates to the handbook and provide staff instruction as necessary.

Conclusion: ECC and Duty Officers Responsive

The division has established effective procedures to assure ECC and duty officer responsiveness to local jurisdiction requests for assistance and information during incidents, emergencies, and disasters.

Chapter IV - Assessments of Emergency Management

Recovery Phase

For the recovery phase, our audit objective asked the question: Are processes, criteria and controls in place and used to assure efficient and effective use of available financial assistance resources following an incident, emergency, or disaster?

Audit assessment: Recovery phase programs are effective, reflecting improvement from 1996 to 1997.

What is Recovery?

According to statute, one of the objectives of Montana's emergency and disaster programs is to provide for the rapid and orderly start of restoration and rehabilitation of persons and property affected by disasters. Section 10-3-105, MCA, also assigns DES the responsibility to direct disaster recovery authorized by the governor.

Based on FEMA criteria, recovery is staff capability, both experience and training, which supports the initial damage assessment activities, survey report/cost estimate procedures, and project monitoring and expenditure tracking.

At the state and local level, recovery phase activities are similar to FEMA's criteria, but also include other considerations: 1) timeliness, to assure compliance with federal milestones, and 2) responsiveness, to assure resources needed for assessment and cost estimation are available when necessary.

Documentation of Damage is Key to Recovery Assistance

To qualify for state and/or federal infrastructure assistance funding, local jurisdictions are required to estimate damage in terms of cost to replace or repair. Based on experience from the 1996 flood-related declarations, DES emphasized the need for complete and accurate local documentation during both the response and recovery phases. For 1996, local coordinators estimated several thousands of dollars of additional repair expense could have qualified for FEMA assistance funding if damage assessment and repair costs had been adequately documented.

In addition to providing training on how to document damage and costs, DES staff continue to update the information contained in the DES-published Local Government Disaster Information Manual (LGDIM), a guide for local coordinators. LGDIM includes sample

Chapter IV - Assessments of Emergency Management

formats for completing damage assessment. The manual also outlines procedures for cost estimates for a wide variety of categories such as roads and bridges, water control facilities, buildings and equipment, and utilities.

Staff Expertise

We found DES staff are familiar with the criteria FEMA uses to approve applications for public infrastructure assistance. Staff work closely with municipal, county and other qualifying entity officials and maintain records to detail project activity from initial damage assessment through on-site final inspection. We found local officials are satisfied with DES oversight of public infrastructure assistance funding.

In addition to LGDIM training to prepare for anticipated floods in 1997, DES staff also provided training on individual assistance. Presented in several municipalities across-the-state, this recovery phase training provided local coordinators with an organized approach to referral for individuals and businesses to needed services.

Conclusion: Recovery Phase Requirements are Effective

By placing emphasis on recovery phase requirements, the division improved the effectiveness of the damage assessment and cost estimation process. Public infrastructure and individual assistance training provided for the 1997 flood event was effective.

Chapter V - District Representatives

Introduction

In Chapters III and IV, we presented summaries indicating the workload and responsiveness of Disaster and Emergency Services Division (DES) district representatives could be improved for many of the aspects of the four phases of emergency management. In this chapter, we discuss the role of district representatives and their capability to cover their area of responsibility. We present a recommendation to improve support of local jurisdictions by decreasing the number of counties assigned to a district and increasing district representative positions.

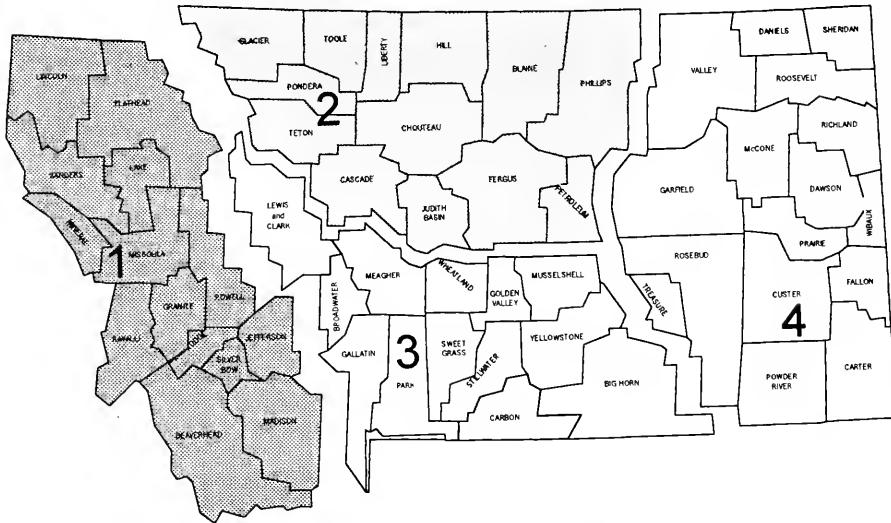
Montana has Four DES Districts

The state is divided into four DES districts with a representative assigned to each district. The four district representatives are responsible for 13 to 16 counties each. The following figure identifies counties in the four districts.

Chapter V - District Representatives

Figure 2

Montana Disaster and Emergency Services Districts



Source: Compiled by the Legislative Audit Division from department records.

District Representatives Advise and Assist

District representatives work with and advise officials from counties and municipalities within their district. District representatives provide assistance with development of disaster and emergency services programs and plans (mitigation and preparedness phases) and assist during emergencies, disasters, and/or incidents as requested by local officials (response and recovery phases).

District Representative Emphasis

Program emphasis for district representatives varies according to the needs of local jurisdictions within a district. We noted significant effort in one district on exercise planning. In another district, emphasis was on State Emergency Operations Plan/annex/standard operating procedures revision and update. In other districts, training was the priority. Since a major portion of our audit work occurred prior to and during the 1997 flooding, we also observed district

Chapter V - District Representatives

representatives prioritizing workload based on helping local coordinators prepare for a flood event.

Capability Affected by Area of Coverage

Distance and related travel time is a factor affecting the capability of a district representative to provide adequate coverage of jurisdictions within the district. In both the western and eastern districts, coverage extends from the Canadian border to Wyoming with road mile distances approaching 400 miles. Work schedules of part-time coordinators complicate the distance issue. Local coordinators may be available only one or two days each week which increases the difficulty associated with scheduling time in local jurisdictions. In many rural counties, the schedules of chief elected officials may also be limited to one or two days a week. Since elected officials play an integral role in disaster and emergency services programs, problem resolution can require the interaction of the district representative, local coordinator and one or more elected officials. Due to time constraints, this can be difficult to achieve.

District Representatives are Focal Point for Requests for Assistance

We noted examples of effective and complete local jurisdiction disaster and emergency services programs across-the-state. However, local coordinators and district representatives identified county program shortfalls in all four phases as discussed in previous chapters. Both agreed available time was the primary contributing factor.

The primary role for DES district representatives is to provide assistance to local jurisdictions. During the audit, we observed examples of district representatives providing assistance during all four phases of emergency management. We also noted, due to time limitations, assistance is usually based on the specific request of a local coordinator or elected official. Such requests are legitimately placed at the top of district representative work priorities. District representatives are also aware of jurisdictions with program shortfalls and limited resources which are not asking for assistance. District representatives are not able to spend the time necessary to work with these jurisdictions to help improve their programs.

Chapter V - District Representatives

Area of Coverage Should be Reduced

Our audit work considered the range of activities associated with assisting local jurisdictions to establish viable programs in all four phases of emergency management. Based on our assessments, to increase district representative effectiveness, area of coverage should be reduced. To reduce districts, DES should consider the number of counties, urban versus rural jurisdictions, and total area and travel distances. In addition, risk analyses of the jurisdictions within a proposed district should be a consideration to help determine potential district representative workload and priorities.

We discussed with DES management alternatives for the number of counties in a district to allow for better coverage by district representatives. Based on our observations of support activities, a maximum of 8-10 counties is more feasible than the current 13-16. Implementation of this alternative would require six district representatives. DES management should review alternatives for districts which will reduce area of coverage and increase district representative effectiveness.

Role Definition also Needed

To improve assistance to local disaster and emergency services programs, DES should review and define the role of district representatives for each phase. The review should be based on the division's examination of local program shortfalls and needs. We identified shortfalls in Chapter III and Chapter IV which addressed:

- Out-of-date local EOPs/annexes (page 26).
- Limited EOC capability (page 28).
- Out-of-date hazard identification and risk analyses (page 32).
- Identification of local mitigation programs (page 35).
- Community training needs (page 42).
- Out-of-date resource lists (page 45).

Chapter V - District Representatives

Identify FTE for District Representative Requirements

Development of specific roles for district representatives should help DES focus on roles for staff in Helena to assure the most effective assignment of responsibilities. As part of this process, DES should identify Helena-based staff responsibilities for reduction, elimination, or reassignment. In Chapters I and IV, we discuss staff responsibilities such as the radiological defense, emergency information system, earthquake awareness, and exercise training, which could be reduced and/or reassigned to help DES identify FTE for district representatives requirements. By increasing the number of district representatives, the division could incur additional cost to support district operations (travel, per diem, supplies). However, the total number of DES FTE would not increase to support this recommendation.

Recommendation #5

We recommend the division:

- A. Review district boundaries to reduce the area of coverage and increase the number of district representatives.
- B. Define the role of district representatives for the four phases of emergency management: mitigation, preparedness, response, and recovery. Role definition should include:
 - Local emergency operations plan update/review.
 - Emergency operation center capabilities.
 - Identification of mitigation projects.
 - Hazards identification and risk analysis.
 - Community training.
 - Resource list development.

Department Agrees with Recommendation

According to department officials, the focus of DES has been customer service and response to requests for assistance. The department agrees that by expanding the number of district representatives, assistance can be improved. The department supports the need for review and definition of the role of district representatives to coincide with re-defining district boundaries and the number of counties for each district.

Agency Response

DEPARTMENT OF MILITARY AFFAIRS



MARC RACICOT, GOVERNOR

P O BOX 4789

STATE OF MONTANA

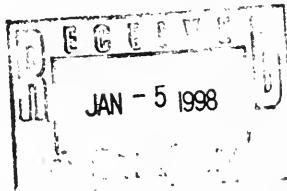
OFFICE OF THE ADJUTANT GENERAL
(406) 444-6910

HELENA MONTANA 59604-4789

January 2, 1998

FC 100.2

Jim Pellegrini
Deputy Legislative Auditor
Performance Audit
Legislative Audit Division
Room 135, State Capitol Building
P.O. Box 201705
Helena, MT 59620-1705



Dear Mr. Pellegrini:

The Department of Military Affairs and the Disaster and Emergency Services (DES) Division have reviewed the Legislative Audit Division's performance audit of DES. We are in general agreement with the conclusion and recommendations. The following is our implementation plan for each of the recommendations.

Recommendation #1

We recommend that DES develop criteria for determining the frequency of local exercises.

Criteria should consider the:

- Need for exercise training.
- Time required to prepare/schedule an exercise.
- Actual events which verify plans.
- Jurisdiction and/or district-wide risks, resources and capabilities.

We concur and will continue to refine criteria, associated training and statement of work requirements. Expected time frames are:

Draft exercise criteria	July 1, 1998
Second draft of exercise course	July 1, 1998
Revision of Local Statement of Work	October 1, 1998

Recommendation #2

We recommend that DES examine alternatives for the development of a cost-effective state hazard mitigation program and seek revision to legislation if warranted.

We concur and will be convening a mitigation working team to develop ideas for a State pre-disaster mitigation program. We will develop a proposal for the 1999 legislature based on the teams' recommendations following the usual State Agency Executive Planning Process.

Recommendation #3

We recommend that DES review the administration of the earthquake program to decentralize activities and increase staff resource effectiveness.

We concur and plan on decentralizing the earthquake program through the district representatives by May 1, 1998.

Recommendation #4

We recommend the division review disaster and emergency services training program alternatives to:

- A. Determine a balance of professional and functional courses.
- B. Designate staff training responsibilities to maximize decentralized training.

4. A. We agree and this function is a continuing process where the balance will shift back and forth as needs evolve. Currently, there is a trend for more functional training that has been incorporated into the FY - 1998 schedule.

4. B. Staff training responsibilities will be adjusted by giving more responsibility to district representatives and increasing the number of district representatives.

Recommendation #5

We recommend the division:

- A. Review district boundaries to reduce the area of coverage and increase the number of district representatives.

Jim Pellegrini
January 2, 1998
Page 3

B. Define the role of district representatives for the four phases of emergency management: mitigation, preparedness, response and recovery. Role definition should include:

- Local emergency operations plan update/review.
- Emergency operation center capabilities.
- Identification of mitigation projects.
- Hazards identification and risk analysis.
- Community training.
- Resource list development.

5. A. We agree and a plan is in progress to accomplish this task. Since all emergencies and disasters are local, it makes sense to decentralize resources. The planned time schedule to go from four to six district representatives is:

5th District Representative	April 1, 1998
6th District Representative	May 1, 1998.

The attached map shows tentative boundaries. Some counties have concerns about the adjustment of district boundaries and they may need to be negotiated.

5. B. This process is currently in progress and has been evolving as emergencies and priorities change. We expect to have a complete formal revision of duties by February 1, 1998.

The Department feels the audit process is very useful and will help Montana be better prepared for disasters in the future. We thank the Legislative Audit Division for the professional way in which they conducted the DES audit.

Sincerely,

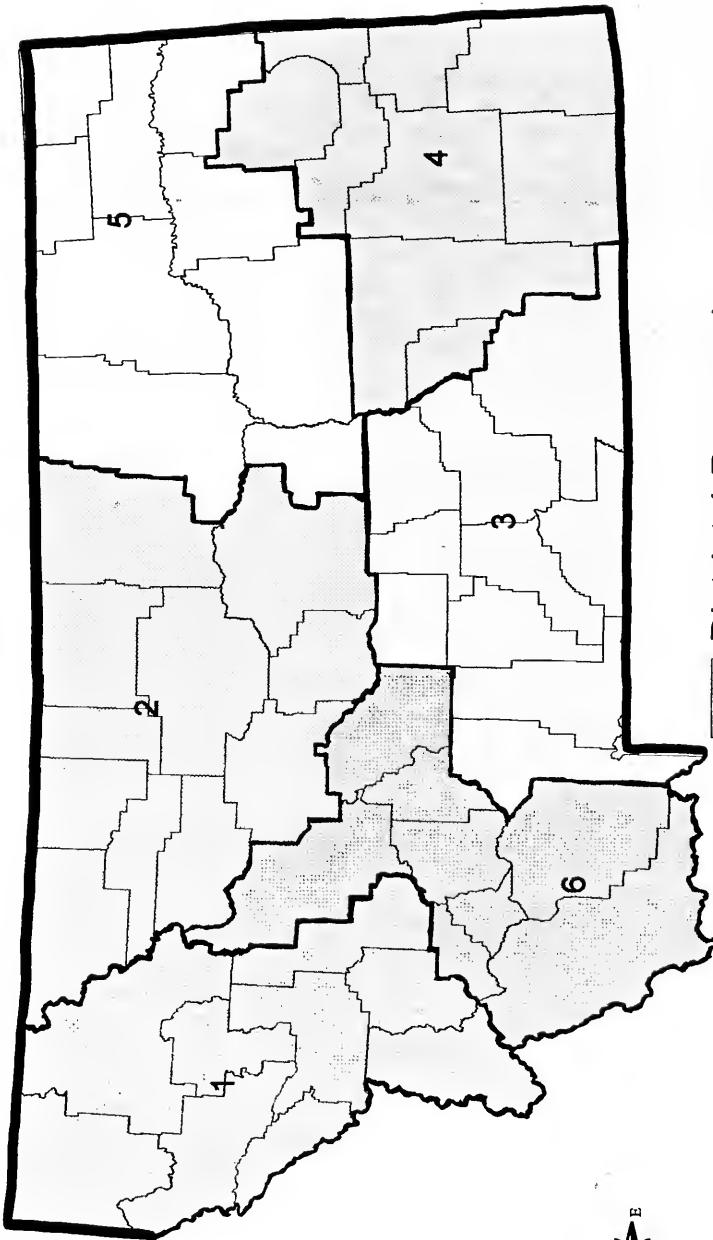


John E. Prendergast
Major General, MT National Guard
The Adjutant General

cc: Jim Greene
Doug Booker

Proposed Disaster and Emergency Services Redistricting

November 1997



- District 1 Proposed
- District 2 Proposed
- District 3 Proposed
- District 4 Proposed
- District 5 Proposed
- District 6 Proposed

A legend consisting of six small rectangular boxes, each containing a different shade of gray or white, corresponding to the proposed districts. The first five boxes are light gray, and the last one is a darker gray.



